

EXHIBIT 3

From: Dingman, Michael S.
Sent: Wednesday, December 07, 2016 4:51 PM
To: 'Ariel Trajtenberg'; deBettencourt, Justin D.
Cc: 'Simon Sandoval-Moshenberg'; Wookie Kim
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.): Deposition of George Caruso

Ariel,

In paragraph 11 of Joy Odom's Declaration filed with the court in support of Plaintiffs' motion to extend the time for filing an opposition to the motion for summary judgment, Ms. Odom states that depositions of Plaintiff's experts are necessary for Plaintiffs to file their opposition. Now you are telling me that is not true because you actually oppose taking Mr. Caruso's deposition before Plaintiffs file their opposition. You also seem insistent on having the deposition during a time when you know that Mr. deBettencourt is out of the country and defendants will be working on their reply brief. In keeping with Ms. Odom's representation to the Court, we are making Mr. Caruso available prior to December 23. Please provide proposed dates for Mr. Caruso's deposition between now and December 23.

With respect to Professor Clark, we will set his deposition for December 22 at 10:00 AM Pacific time.

Mike Dingman
MDingman@reedsmith.com

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Please note our new address effective 3-21-16: 7900 Tysons One Place, Suite 500, McLean, VA 22102

From: Ariel Trajtenberg [mailto:arieltrajtenberg@quinnemanuel.com]
Sent: Wednesday, December 07, 2016 3:08 PM
To: Dingman, Michael S.; deBettencourt, Justin D.
Cc: 'Simon Sandoval-Moshenberg'; Wookie Kim
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.): Deposition of George Caruso

Mike,

You are correct that the parties agreed to conduct expert depositions after the close of discovery, per Defendants' request. As you will see from the attached email correspondence, we agreed the depositions could occur up to two weeks before trial. In light of the January 27th summary judgment hearing, it is unlikely trial will begin within two weeks of the first week of January, so a deposition that week falls within our agreement. That said, in an effort to

accommodate your preference to complete Mr. Caruso's deposition in December, we are available on December 27, 28, or 29. Please let us know if any of these dates works for Mr. Caruso. Otherwise, please provide his availability for a deposition the first week of January.

Professor Clark is available at 1:00pm on December 21 or 22 to be deposed in the method you describe, by videoconference at Reed Smith's Los Angeles office. Please let us know if December 21 or 22 works for you. Would you please also let us know how much time you anticipate requiring for Professor Clark?

Best,
Ariel

Ariel Wade Trajtenberg
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From: Dingman, Michael S. [<mailto:MDingman@ReedSmith.com>]
Sent: Tuesday, December 06, 2016 11:54 AM
To: Ariel Trajtenberg <arieltrajtenberg@quinnemanuel.com>; deBettencourt, Justin D. <JdeBettencourt@ReedSmith.com>
Cc: 'Simon Sandoval-Moshenberg' <simon@justice4all.org>; Wookie Kim <wookiekim@quinnemanuel.com>
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.): Deposition of George Caruso

Ariel,

We agreed to allow expert depositions after the discovery cut-off date of December 9, but we cannot agree to push discovery into January. Please provide us with available dates for a deposition of Mr. Caruso over the next two weeks and we will arrange for his deposition. Defendants would also like to depose Professor Clark and suggest December 19 or 20 for his deposition. Since he is in Los Angeles, we would have him come to our office in Los Angeles and conduct the deposition by video conference. Please let me know if Professor Clark is available on either of those dates. Thank you.

Mike Dingman
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From: Ariel Trajtenberg [<mailto:arieltrajtenberg@quinnemanuel.com>]
Sent: Monday, December 05, 2016 9:49 PM

To: Dingman, Michael S.; deBettencourt, Justin D.

Cc: 'Simon Sandoval-Moshenberg'; Wookie Kim

Subject: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.): Deposition of George Caruso

Mike and Justin,

Would you please let us know George Caruso's availability for a deposition the week of January 3?

Best,

Ariel

Ariel Wade Trajtenberg

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